IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

STEPHANIE HIGGINS, for herself and all others similarly situated,) Case No. 3:16-cv-02382-MEM
Plaintiff, v.	Hon. Malachy E. Mannion
BAYADA HOME HEALTH CARE, INC.)
Defendant.)))

PLAINTIFF'S MOTION FOR CONDITIONAL CERTIFICATION AND ISSUANCE OF NOTICE UNDER 29 U.S.C. § 216(b)

For the reasons stated in the forthcoming Memorandum, Plaintiff respectfully moves this Court to enter the proposed Order granting conditional certification of this action as a representative collective action and authorizing the dissemination of Class Notice to all similarly-situated persons pursuant to the "opt-in" mechanism for collective actions authorized by the Fair Labor Standards Act, 29 U.S.C. § 216(b), and granting the other relief described therein.

DATED: May 1, 2017 Respectfully Submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that he caused a copy of the foregoing pleading to be served upon all record counsel by electronically filing said document *via* the Court's ECF system on May 1, 2017.

/s/ James B. Zouras